

STEPHANIE M. HINDS (CABN 154284)
 United States Attorney
 MICHELLE LO (NYRN 4325163)
 Chief, Civil Division
 DAVID M. DEVITO (CABN 243695)
 Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
 San Francisco, California 94102-3495
 Telephone: (415) 436-7332
 Facsimile: (415) 436-6748
 E-mail: david.devito@usdoj.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

THE CENTER FOR INVESTIGATIVE
 REPORTING,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
 JUSTICE,

Defendant.

No. 3:17-cv-06557-JSC

**STIPULATION AND [PROPOSED] ORDER TO
 CONTINUE CASE MANAGEMENT
 CONFERENCE**

Pursuant to Civ. L.R. 6-2 and 7-12, the Parties, through undersigned counsel, submit the following stipulation and request to continue the upcoming case management conference and associated deadlines.

WHEREAS, a Case Management Conference is currently scheduled in this matter for August 31, 2022. (ECF No. 69).

WHEREAS, the Parties have met and conferred regarding Plaintiff's claim for attorney's fees and costs, which is the only outstanding unresolved issue in the case.

WHEREAS, the Parties have exchanged settlement proposals and remain engaged in active negotiations. The Parties agree the meet and confer process has yielded significant progress toward a

1 potential resolution, and that additional time is needed so that the Parties can continue to meet and
2 confer in an effort to resolve Plaintiff's claim for attorney's fees and costs without the need for further
3 litigation. The Parties believe that continuing the meet-and-confer process for this additional period is
4 likely to be productive, and could potentially eliminate the need for further Court involvement.

5 WHEREAS, the Parties further agree that if after this additional meet and confer period they are
6 unable to resolve Plaintiff's claim for attorney's fees and costs, they shall submit a joint proposed
7 briefing schedule for Plaintiff's motion for attorney's fees and costs.

8 NOW THEREFORE, the Parties hereby stipulate that the case management conference should
9 be continued to October 6, 2022 at 1:30 p.m., and respectfully request that the Court order the
10 continuance.

11 IT IS SO STIPULATED.

12 DATED: August 24, 2022

Respectfully submitted,

13 STEPHANIE M. HINDS
14 United States Attorney

15 /s/ David M. DeVito*
16 DAVID M. DEVITO
Assistant United States Attorney

17 Attorneys for Defendant

18 DATED: August 24, 2022

THE CENTER FOR INVESTIGATIVE
REPORTING

19 /s/ D. Victoria Baranetsky
20 D. VICTORIA BARANETSKY

21 Attorneys for Plaintiff
22
23
24
25
26

27
28 * In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty
of perjury that counsel for Plaintiff has concurred in the filing of this document.

[PROPOSED] ORDER

Pursuant to the stipulation of the parties, it is hereby ordered that:

1. The Case Management Conference currently set for August 31, 2022 at 1:30 p.m. is hereby continued to October 6, 2022 at 1:30 p.m.; and
2. The Parties will provide the Court with a Joint Case Management Statement by September 29, 2022.

IT IS SO ORDERED.

DATED: _____

HON. JACQUELINE SCOTT CORLEY
United States District Judge